

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

MANUEL E. PAIZ GUEVARA

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Case no. 1:14-CR-306-GBL - 8

MOTION FOR ATTORNEY CONDUCT VOIR DIRE

COMES NOW, MANUEL GUEVARA, hereinafter referred to as Defendant, by and through counsel and, pursuant to Rule 24, of the Federal Rules of Criminal Procedure and the Sixth Amendment of the United States Constitution and file this, his Motion for Attorney Conducted Voir Dire. Defendant seeks the entry of an order permitting thirty (30) minutes of attorney conducted voir dire, per party.

In support of the motion the defendant would allege and prove the following:

1. That the Federal Rules of Criminal Procedure permit the relief requested by defendant.
2. That the defendant, who enjoys the constitutional protection of the effective assistance of counsel during voir dire, cannot have effective

assistance of counsel without attorney conducted voir dire in that critical phase of the trial.

3. That the time requested, in addition to whatever preliminary juror qualification questions which may be offered by the court, is not excessive.
4. That preliminary and expedient resolution of this motion is necessary for proper trial preparation by the defendant.

WHEREFORE, premises considered, defendant prays that the above and foregoing motion be, in all things, granted.

Respectfully submitted,

_____/S/_____
David P. Baugh, Esq.
W. Michael Chick, Jr. Esq.
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing MOTON FOR ATTORNEY CONDUCTED VOIR DIRE was served, via ECF upon:

Stephen M. Campbell, Esq.
Julia K Martinez, Esq.
Assistant United States Attorneys
Eastern District of Virginia

2100 Jamison Avenue
Alexandria, Virginia 22314,

And all other defendants in this matter by the Court's electronic filing
system.

/s/ David P. Baugh
David P. Baugh